

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

G. HOLDINGS LTD.,

§ § § § § § § § § §

Plaintiff,

Civil Action No.: 2:20-cv-00342-JRG

V.

JURY TRIAL DEMANDED

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA
INC.,

Defendant.

JURY TRIAL DEMANDED

P.R. 4-3 – JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent Rule 4-3, all parties to the above-captioned action hereby submit their Joint Claim Construction and Prehearing Statement regarding U.S. Patent Nos. 7,628,333 and 9,022,294.

I. Construction of Claim Terms on which the Parties Agree

Pursuant to P.R. 4-3(a)(1), the parties have been unable to agree upon any constructions.

II. Each Party's Proposed Construction of Each Disputed Claim Term

Pursuant to P.R. 4-3(a)(2), the parties have attached a chart hereto as Appendix 1, which shows each party's proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction or to oppose any other party's proposed construction, including but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses. Where intrinsic and extrinsic citations have been made for a particular claim term, phrase, or clause, they should be understood as applicable to each other instance where the same term, phrase, or clause appears elsewhere.

III. Anticipated Length of Time for Claim Construction Hearing

Pursuant to P.R. 4-3(a)(3), the parties anticipate that they will need a combined total of 3 hours for presentation at the Claim Construction Hearing.

IV. Witness Testimony at Claim Construction Hearing

Pursuant to P.R. 4-3(a)(4), the parties do not at this time anticipate calling witnesses at the Claim Construction Hearing.

V. Other Issues for Prehearing Conference

Pursuant to P.R. 4-3(a)(5), the parties do not believe there are any prehearing issues to be addressed by the Court.

Dated: April 9, 2021

Respectfully submitted,

/s/ Elizabeth L. Brann

Elizabeth L. Brann
CA Bar No. 222873

elizabethbrann@paulhastings.com

Ariell N. Bratton
CA Bar No. 317587

ariellbratton@paulhastings.com

Cole Malmberg
CA Bar No. 305250

colemalmbg@paulhastings.com

PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, California 92121
Telephone: 1(858) 458-3000
Facsimile: 1(858) 458-3005

Christopher W. Kennerly
TX Bar No. 00795077

chriskennerly@paulhastings.com

PAUL HASTINGS LLP
1117 South California Avenue
Palo Alto, California 94304
Telephone: 1(650) 320-1800
Facsimile: 1(650) 320-1900

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: 1(903) 934-8450
Facsimile: 1(903) 934-9257
Email: melissa@gillamsmithlaw.com

*Attorneys for Defendants
Samsung Electronics Company, Ltd., and
Samsung Electronics America, Inc.*

Rodney R. Miller
Texas Bar No. 24070280
Admitted in this District
rmiller@hallboothsmith.com
HALL BOOTH SMITH, P.C.
191 Peachtree Street, NE, Suite 2900
Atlanta, GA 30303
T: 404.586.6601
F: 404.954.5020

Daniel C. Miller
New York Bar No. 4232773
(*Admitted Pro Hac Vice*)
dmiller@hallboothsmith.com
HALL BOOTH SMITH, P.C.
366 Madison Ave, Fifth Floor
New York, NY 10017
T: 917.805.2460

Karl Braun
Tennessee Bar No. 022371
(*Admitted Pro Hac Vice*)
kbraun@hallboothsmith.com
HALL BOOTH SMITH, P.C.
424 Church, Suite 2950
Nashville, TN 37219
T: 615.313.9911

Edward R. Nelson III
ed@nbafirm.com
Christopher G. Granaghan
chris@nbafirm.com
NELSON BUMGARDNER
ALBRITTON PC
3131 West 7th Street, Suite 300
Fort Worth, Texas 76107
T: (817) 377-9111
F: (817) 377-3485

COUNSEL FOR PLAINTIFF
G. HOLDINGS, LTD.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via electronic mail, to all counsel of record, on this 9th day of April, 2021.

/s/ *Elizabeth L. Brann*
Elizabeth L. Brann